

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and  
IME MANAGEMENT & CONSULTING LLC,

Defendants.

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SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

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CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABUDLRAHIM GELARDI, VITO GELARDI,  
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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**Case No.: 1:22-cv-1032 (PKC) (JRC)**

**DECLARATION OF JAMIE S. FELSEN,  
ESQ. IN SUPPORT OF PLAINTIFF’S  
AND THIRD-PARTY DEFENDANT  
CARLOS ROA’S APPLICATION FOR  
ATTORNEYS’ FEES AND  
COMPENSATORY DAMAGES ARISING  
OUT OF DEFENDANTS’ CONTEMPT**

I, Jamie S. Felsen, Esq., pursuant to 28 U. S.C. § 1746, declare as follows:

1. I am a partner with the law firm Milman Labuda Law Group PLLC (“MLLG”),  
counsel for IME WatchDog, Inc. (hereinafter “Plaintiff”) in the above-referenced case.

2. I submit this declaration in support of Plaintiff's application for reasonable attorneys' fees and costs associated with Plaintiff's motion for contempt and the instant fee application.

**Education & Litigation Experience**

3. I have been practicing law for in excess of eighteen (18) years. I graduated from St. John's University School of Law in 2005.

4. I am a member of the bar in the State of New York, as well as in the United States District Courts for the Southern, Eastern, and Northern Districts of New York, the United States Court of Appeals for the Second Circuit, and the Supreme Court of the United States.

5. I started at MLLG as an associate in 2005 directly after sitting for the bar examination and have been a partner since 2014.

6. MLLG is a law firm that exclusively practices labor and employment law. Outside of a few rare instances, MLLG exclusively represents employers in such litigation matters.

**Fees & Costs Billed in the Instant Matter**

7. During the period of time that this matter has been pending, I billed MLLG's clients at a rate of up to \$650.00 per hour. However, I reduced my rate for this matter and billed at \$450.00 per hour for my services.

8. All of the work I have performed and recorded in this case was made in connection with Plaintiff's Motion for Contempt and was reasonably necessary for Plaintiff to prevail on such motion.

9. The hours that I worked and the details supporting same are reflected in the time entries annexed to the Declaration of Daniella Levi, Esq.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 19, 2023.

**MILMAN LABUDA LAW GROUP PLLC**

/s/Jamie S. Felsen

Jamie S. Felsen, Esq.